

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(RICHMOND DIVISION)

GOLDEN BETHUNE-HILL, *et al.*,

Plaintiffs,

v.

VIRGINIA STATE BOARD OF
ELECTIONS, *et al.*,

Defendants.

Civil Action No. 3:14-cv-00852-REP-AWA-BMK

**DEFENDANT-INTERVENORS’ OBJECTIONS TO
PLAINTIFFS’ DISCOVERY DESIGNATIONS & EXHIBIT LIST**

Defendant-Intervenors, the Virginia House of Delegates and Virginia House of Delegates Speaker William J. Howell (“Defendant-Intervenors”), through counsel, hereby identify their objections to Plaintiffs’ discovery designations and exhibits.

I. Deposition Transcript of Delegate Roslyn C. Tyler

Defendant-Intervenors object to the following designations on the grounds that they violate Federal Rules of Evidence 602, 701, and the rule against hearsay.

	Designation ¹
a.	63:24-66:16
b.	67:2-15
c.	70:16-76:17
d.	81:20-82:16
e.	84:6-10

¹ Cited sections include Plaintiffs’ designations and Defendant-Intervenors’ related counter-designations.

f.	84:25-85:8
g.	86:2-88:2
h.	89:10-21

II. Deposition Transcript of Christopher Michael Marston

Defendant-Intervenors object to Plaintiffs' designations in the deposition transcript of Christopher M. Marston on the ground that they violate the rule against hearsay; Mr. Marston was not identified on any witness list in this matter and he has not been deemed unavailable as a witness for the purpose of satisfying any exception to the rule against hearsay.

III. Plaintiffs' Exhibit List

Defendant-Intervenors object to Plaintiffs' proposed exhibits P-069 and P-070 on the grounds that they violate Federal Rules of Evidence 702 and 703.

Dated: September 18, 2017

Respectfully submitted,

VIRGINIA HOUSE OF DELEGATES
AND VIRGINIA HOUSE OF DELEGATES
SPEAKER WILLIAM J. HOWELL

By Counsel

/s/ Katherine L. McKnight

Katherine L. McKnight (VSB No. 81482)

E. Mark Braden (*pro hac vice*)

Richard B. Raile (VSB No. 84340)

BAKER HOSTETLER LLP

1050 Connecticut Avenue, NW Suite 1100

Washington, DC 20036

Telephone: 202.861.1500

Facsimile: 202.861.1783

kmcknight@bakerlaw.com

mbraden@bakerlaw.com

rraile@bakerlaw.com

Dalton L. Oldham, Esq. (*pro hac vice*)

1119 Susan St.

Columbia, SC 29210

Telephone: 803-772-7729

dloesq@aol.com

*Attorneys for the Virginia House of Delegates and
Virginia House of Delegates Speaker William J. Howell*

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of September, 2017, the foregoing Defendant-Intervenors' Objections to Plaintiffs' Discovery Designations and Exhibits was filed and served on all counsel of record pursuant to the Court's electronic filing procedures using the Court's CM/ECF system.

/s/ Katherine L. McKnight

Katherine L. McKnight (VSB No. 81482)

E. Mark Braden (*pro hac vice*)

Richard B. Raile (VSB No. 84340)

BAKER HOSTETLER LLP

1050 Connecticut Avenue, NW Suite 1100

Washington, DC 20036

Telephone: 202.861.1500

Facsimile: 202.861.1783

kmcknight@bakerlaw.com

mbraden@bakerlaw.com

rraile@bakerlaw.com

*Attorneys for the Virginia House of Delegates and
Virginia House of Delegates Speaker William J. Howell*